

**To:** Wayland, Richard[Wayland.Richard@epa.gov]  
**From:** Naess, Liz  
**Sent:** Mon 7/14/2014 1:38:00 PM  
**Subject:** Re: Follow-up to July 2, 2014, Data Issues with PM Designations Meeting

GA used 2011-2013 data.

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**From:** Wayland, Richard  
**Sent:** Monday, July 14, 2014 8:07:45 AM  
**To:** Naess, Liz  
**Cc:** Reff, Adam  
**Subject:** FW: Follow-up to July 2, 2014, Data Issues with PM Designations Meeting

Region 4 is briefing their RA today and I told them that we were preliminarily leaning towards

## Ex. 5 - Deliberative

Richard A. "Chet" Wayland | Director | Air Quality Analysis Division - Mail Code C304-02 | Office of Air Quality Planning & Standards | U.S. Environmental Protection Agency | Research Triangle Park, NC 27711 | Desk: 919-541-4603 | Cell: 919-606-0548 | Fax: 919-685-3377 |

**From:** Gettle, Jeanneanne  
**Sent:** Monday, July 14, 2014 8:43 AM  
**To:** Wayland, Richard  
**Subject:** RE: Follow-up to July 2, 2014, Data Issues with PM Designations Meeting

Chet,

As a follow up, we would appreciate you looking closely at Atlanta and Columbus for 2010 – 2012. Do we have complete data by substitution?

Thanks

jeanneanne

**From:** Wayland, Richard  
**Sent:** Monday, July 14, 2014 8:13 AM  
**To:** Gettle, Jeaneanne  
**Subject:** FW: Follow-up to July 2, 2014, Data Issues with PM Designations Meeting

Here you go...

Richard A. "Chet" Wayland | Director | Air Quality Analysis Division - Mail Code C304-02 | Office of Air Quality Planning & Standards | U.S. Environmental Protection Agency | Research Triangle Park, NC 27711 | Desk: 919-541-4603 | Cell: 919-606-0548 | Fax: 919-685-3377 |

**From:** Naess, Liz  
**Sent:** Thursday, July 10, 2014 2:18 PM  
**To:** Wayland, Richard  
**Cc:** Hemby, James  
**Subject:** RE: Follow-up to July 2, 2014, Data Issues with PM Designations Meeting

Updates:

TN: Adam and I have reviewed the 2010-2012 and 2011-2013 data and there are no valid DVs. I have spoken with R4 and Beth and the plan is to move forward with Unclassifiable for the state (possibly U/A for Chattanooga which does have valid DVs).

## Ex. 5 - Deliberative

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Liz Naess, Ph.D.

Air Quality Analysis Group

U.S. EPA OAQPS/AQAD

Research Triangle Park, NC 27711

919.541.1892

**To:** Papp, Michael[Papp.Michael@epa.gov]  
**From:** Naess, Liz  
**Sent:** Thur 7/10/2014 5:20:00 PM  
**Subject:** RE: IEPA/CCDEC Status

Thanks Mike. The IEPA TSA report is what Lew had sent before.

Fun times....

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Liz Naess, Ph.D.

Air Quality Analysis Group

U.S. EPA OAQPS/AQAD

Research Triangle Park, NC 27711

919.541.1892

**From:** Papp, Michael  
**Sent:** Thursday, July 10, 2014 12:48 PM  
**To:** Naess, Liz; Weinstock, Lewis  
**Subject:** RE: IEPA/CCDEC Status

No I do not know any more than what you have here. As far as reports I'm not sure what you might be referring to I have attached some TSA reports from Region 5 (IEPA seems to still be in draft phase.

I've also attached a document I was putting together of the various finding from the TSA's. IEPA is not is this table but could be added. I don't know if this is what you are referring to but I have not put much work into this since we were waiting for more definitive information from the Regions.

**From:** Naess, Liz  
**Sent:** Thursday, July 10, 2014 12:27 PM  
**To:** Weinstock, Lewis; Papp, Michael  
**Subject:** FW: IEPA/CCDEC Status

Hey Mike and Lew,

Please read below what R5 is working on....thoughts? Concerns? I haven't seen the analysis they are preparing. Do either of you know more?

Also, email before June is not showing up on my computer right now, so I can't find the report you sent Lew about the QA issues. If one of you can find that quickly, will you resend? If you have to search for it, don't worry about it.

Thanks, Liz

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Liz Naess, Ph.D.

Air Quality Analysis Group

U.S. EPA OAQPS/AQAD

Research Triangle Park, NC 27711

919.541.1892

**From:** Palma, Elizabeth  
**Sent:** Monday, July 07, 2014 10:15 AM  
**To:** Summerhays, John; Jay, Michael; Hawkins, Andy; Huey, Joel; Benjamin, Lynorae  
**Cc:** McGrath, Jesse; Lehrman, Loretta; Aburano, Douglas; Naess, Liz; Jones, Rhea; Keating, Martha; Doll, Dennis; Evangelista, Mark  
**Subject:** RE: IEPA/CCDEC Status

John –

Thanks for the update. As FYI, re Jesse's note on the status of TN and GA, we are likely to recommend an "unclassifiable" designation for some areas in these states. Note, however, that historical data for most of these areas indicate attainment, which is different than the scenario in IL.

**Ex. 5 - Deliberative**

**Ex. 5 - Deliberative**

We are currently reviewing the regional TSDs and anticipate discussions with the regions later this week. I'll also provide an update during our 7/10/14 PM Designations work group call

**Ex. 6 - Personal Privacy**

Beth

**From:** Summerhays, John  
**Sent:** Thursday, July 03, 2014 5:46 PM  
**To:** Jay, Michael; Hawkins, Andy; Palma, Elizabeth; Huey, Joel; Benjamin, Lynorae  
**Cc:** McGrath, Jesse; Lehrman, Loretta; Aburano, Douglas  
**Subject:** FW: IEPA/CCDEC Status

Here is a summary of the status of our review of data quality in Illinois. Thanks, Jesse.

**From:** McGrath, Jesse  
**Sent:** Thursday, July 03, 2014 2:04 PM  
**To:** Czerniak, George; Persoon, Carolyn; Ross, Anthony; Caudill, Motria; Furey, Eileen; Summerhays, John; Mooney, John; Aburano, Douglas; Lehrman, Loretta  
**Cc:** McEvoy, Chad  
**Subject:** IEPA/CCDEC Status

I'm getting requests for updates from different people so here's a general update for everyone.

The overall plan is still to

## Ex. 5 - Deliberative

Labs in Tennessee and Georgia are also having issues and

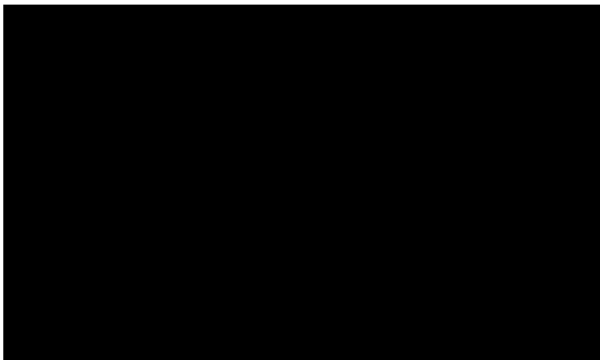
### Ex. 5 - Deliberative

Ex. 5 - Deliberative I don't know what the issues are; OAQPS is summarizing the issues nationally and we should have a broad picture within a week or two. We don't want to stretch anything too thin and risk making a decision that won't stand up to scrutiny, but we see evidence that we can justify using this data and are willing to put in the work to do that.

**To:** Jones, Rhea[Jones.Rhea@epa.gov]  
**Cc:** Palma, Elizabeth[Palma.Elizabeth@epa.gov]; Keating, Martha[keating.martha@epa.gov]; Evangelista, Mark[Evangelista.Mark@epa.gov]  
**From:** Naess, Liz  
**Sent:** Tue 8/12/2014 5:31:01 PM  
**Subject:** RE: Status of PMD 120-day letters and documentation issues

# Not Responsive

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Not responsive

**From:** Jones, Rhea  
**Sent:** Tuesday, August 12, 2014 11:16 AM  
**To:** Wood, Anna  
**Cc:** Palma, Elizabeth; Keating, Martha; Naess, Liz; Evangelista, Mark  
**Subject:** Status of PMD 120-day letters and documentation issues

Hi Anna,

# Not Responsive



# Not Responsive

Summary of unresolved documentation issues:

## Ex. 5 - Attorney Client

- Regions have provided TSDs for the relevant unclassifiable areas that need OGC review. These TSDs focus on the counties included in the U/C or deferred areas, but do not opine on other nearby counties not included.

**Not Responsive**

**Not Responsive**

- OAQPS has provided a deferred areas memo that describes the basis for our decision to defer areas and provides a short narrative for each area to support why we've included the identified counties to defer. This is in place of full blown TSDs for deferred areas. We believe this is sufficient for deferred areas since the contribution analysis we've seen from the Regions supports the counties included, and since any area included or excluded from the deferred area is not a final decision at the 120-day point. If there's a need to correct intended boundaries for deferred areas or areas tentatively identified as unclassifiable/attainment, we can do so prior to finalizing designations for these areas.

Status of documents needed to support 120-day letters:

# Not Responsive

- The deferred area memo is in the team room as well. It describes the basis for our decision to defer areas and provides a narrative for each area to support why we've included the identified counties to defer. This is in place of full blown TSDs for deferred areas.

- Regions are currently routing 120-day letters for RA signature anticipating an August 14<sup>th</sup> signature date. Area specific letters have been provided to the Regions that have unclassifiable areas due to data issues, and that have deferred areas. OGC has commented on the deferred area 120-day letter which impacts R4, and OAQPS will work with R4 to revise the letter.

- Design Values Table: is being finalized in AQAD and will be ready to post to the website along with 120-day letters

Status of other documents needed to support the designations, but are not critical by the 120-day letter deadline:

These documents should be completed ASAP but are second priority to the documents listed above.

- All “data issues” memos for impacted states are in sharepoint for OGC review, with the exception of the Illinois data issues memo. I understand it is forthcoming today. This memo documents the QA/QC and/or data completeness issues for each impacted state.
- Federal Register notice has been drafted and will be sent to OGC for review today. We typically have the notice signed the day we send 120-day letters, but this is not a critical step for sending the letters. It should be signed within a couple of days of 120-day letters, as its publication initiates the start of the public comment period. Steve Page signs this FRN.
- Docket completion: all Regions are loading items for the docket. The docket will not become public until the FRN is published, so we have a few extra days to finalize if needed.

Thank you,

Rhea Jones, Group Leader

Geographic Strategies Group

USEPA - Office of Air Quality and Planning Standards

Air Quality Policy Division

109 TW Alexander Drive (C539-04)

Research Triangle Park, NC 27711

919-541-2940

**To:** Jones, Rhea[Jones.Rhea@epa.gov]  
**From:** Keating, Martha  
**Sent:** Mon 8/11/2014 8:25:29 PM  
**Subject:** FW: time out on TSD contents - RE: Please review this revised language for the 120 letters for GA, IL, TN and associated areas

FYI

ci



(b)(5) deliberative

**From:** Wilcox, Geoffrey  
**Sent:** Monday, August 11, 2014 4:24 PM  
**To:** Palma, Elizabeth; Keating, Martha; Schneeberg, Sara; Versace, Paul; Vijayan, Abi  
**Cc:** Koerber, Mike; Naess, Liz  
**Subject:** FW: time out on TSD contents - RE: Please review this revised language for the 120 letters for GA, IL, TN and associated areas  
**Importance:** High

Beth and Martha:

Sara confirmed what I said below and asked for us to have a call to get straight on this.

G

**From:** Wilcox, Geoffrey  
**Sent:** Monday, August 11, 2014 3:37 PM  
**To:** Keating, Martha; Schneeberg, Sara  
**Cc:** Palma, Elizabeth; Jones, Rhea; Versace, Paul; Vijayan, Abi  
**Subject:** time out on TSD contents - RE: Please review this revised language for the 120 letters for GA, IL, TN and associated areas  
**Importance:** High

PRIVILEGED COMMUNICATION

Martha and Beth:

**Ex. 5 - Attorney Work Product**

## Ex. 5 - Attorney Work Product

**From:** Keating, Martha

**Sent:** Monday, August 11, 2014 3:00 PM

**To:** Schneeberg, Sara; Wilcox, Geoffrey

**Cc:** Palma, Elizabeth; Jones, Rhea

**Subject:** Please review this revised language for the 120 letters for GA, IL, TN and associated areas

Hi Sara and Geoff –

Thanks for the earlier review of the 120 letters. Because of the changes to the various areas with data issues, I have prepared new letters for Regions 4, 5 and 7 to account for the different classifications of counties (nonattainment, unclassifiable and deferred).

## Ex. 5 - Attorney Client

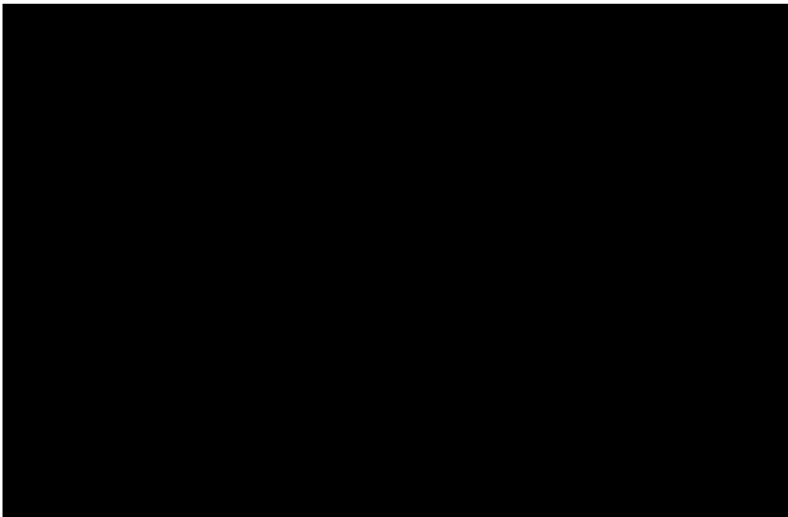
Please let me know if you have any questions or comments.

Thanks

Mk

## **Ex. 5 - Attorney Client**

# Ex. 5 - Attorney Work Product



(b)(5) Attorney Work Product



**To:** Jones, Rhea[Jones.Rhea@epa.gov]; Palma, Elizabeth[Palma.Elizabeth@epa.gov]; Keating, Martha[keating.martha@epa.gov]  
**Cc:** Huey, Joel[Huey.Joel@epa.gov]  
**From:** Benjamin, Lynorae  
**Sent:** Thur 8/7/2014 6:57:59 PM  
**Subject:** RE: PM designations and TSD review process UPDATE!

Yes... we had plan to come up with a paragraph to put in the template letter once things settled out... we will send this to you all for your review....

**From:** Jones, Rhea  
**Sent:** Thursday, August 07, 2014 1:23 PM  
**To:** Palma, Elizabeth; Benjamin, Lynorae; Keating, Martha  
**Cc:** Huey, Joel  
**Subject:** RE: PM designations and TSD review process UPDATE!

Hi all,

Lynorae, in addition to the TSDs, we should have a plan for what the 120-day letters will say for GA and TN, (and impacted other states). Do you think you all will be able to inform this using the 120-day letter template and the draft memo Beth will share?

**From:** Palma, Elizabeth  
**Sent:** Thursday, August 07, 2014 12:34 PM  
**To:** Benjamin, Lynorae; Keating, Martha; Jones, Rhea  
**Cc:** Huey, Joel  
**Subject:** RE: PM designations and TSD review process UPDATE!

Lynorae –

As indicated in Scott's attached email, we met after the McCabe briefing to discuss documentation needs for both deferred and unclassifiable areas. Scott's email provides detail on the deferred areas (I will take a first pass at this memo and forward to you for comment later today).

We intend to stick with our original plan to develop separate TSDish documents for each of the unclassifiable areas. These documents will identify the unclassifiable counties, refer to Liz's documentation for more detail on the data issues, and then provide narrative detail re the counties to be included within the unclassifiable area boundary. I'll take a look at your current Georgia TSD and make modifications as needed given the guidance we received from Janet this morning. (I plan to let you know something on this by the end of the day, as well.) We'll follow the same process for TN – I think the version of the TN TSD in sharepoint focuses on the Knoxville nonattainment area, so this will need to change. (The TN TSD might also need to pull in MS and AR if we arrive at that conclusion.)

Feel free to call if you have any questions. I'll be back in touch later today.

Beth

**From:** Benjamin, Lynorae

**Sent:** Wednesday, August 06, 2014 8:58 PM

**To:** Keating, Martha; Jones, Rhea; Palma, Elizabeth

**Subject:** Re: PM designations and TSD review process UPDATE!

Hi Rhea/Martha/Beth,

# Nonresponsive

Also, some clarity on whether we need a TSD for deferred areas based on today's discussion would be helpful as soon as possible.

I hope your day is going well. Lynorae

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**From:** Keating, Martha

**Sent:** Wednesday, August 6, 2014 4:26:17 PM

**To:** 2012 PM NAAQS Designations Group

**Not Responsive**

**Not Responsive**

**Not Responsive**

**To:** Jones, Rhea[Jones.Rhea@epa.gov]  
**From:** Perry, Nancy  
**Sent:** Wed 8/6/2014 2:40:43 PM  
**Subject:** RE: PM designations part IV slides

Done.

**From:** Jones, Rhea  
**Sent:** Wednesday, August 06, 2014 10:35 AM  
**To:** Perry, Nancy  
**Subject:** FW: PM designations part IV slides

Hi Nancy, could you print this out for me, full pages in color? Thanks!

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**From:** Mathias, Scott  
**Sent:** Tuesday, August 5, 2014 5:07 PM  
**To:** Weber, Rebecca; Tapp, Joshua; Jay, Michael; Czerniak, George; Mooney, John; Aburano, Douglas  
**Cc:** Jones, Rhea; Palma, Elizabeth  
**Subject:** PM designations part IV slides

R5/R7 Colleagues

Here's the version that went up to DC.

For the actual presentation of the R5/R7 areas, I'm planning to do all of the introductory slides, then I'll introduce each area by describing what is on the page, then allow Janet to ask questions and allow the Regions to make points they wish to make.

## Ex. 5 - Attorney Client

# **Ex. 5 - Attorney Client**

Scott Mathias | Associate Director, Air Quality Policy Division | U.S. EPA, RTP, NC 27711 | 919.541.5310

**From:** Evangelista, Mark  
**Location:** RTP-OAQPS-919-541-4248-AQAD/Phone-Line/RTP-OAQPS-BLDG-C, LNO  
**Importance:** Normal  
**Subject:** FW: PM2.5 Designations: materials for the docket (call-in: 919-541-4248)  
**Start Date/Time:** Wed 8/6/2014 2:30:00 PM  
**End Date/Time:** Wed 8/6/2014 3:00:00 PM

I've got it. I just didn't have it on my phone yet.

-----Original Appointment-----

**From:** Naess, Liz  
**Sent:** Sunday, August 03, 2014 11:03 PM  
**To:** Naess, Liz; Wilcox, Geoffrey; Schneeberg, Sara; Orlin, David; Evangelista, Mark; Palma, Elizabeth; Jones, Rhea  
**Subject:** PM2.5 Designations: materials for the docket (call-in: 919-541-4248)  
**When:** Wednesday, August 06, 2014 10:30 AM-11:00 AM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** RTP-OAQPS-919-541-4248-AQAD/Phone-Line/RTP-OAQPS-BLDG-C, LNO

With all the data issues going on with PM2.5, we wanted to touch base quickly with OGC about

## Ex. 5 - Attorney Client

Please shoot me an email beforehand if you have any questions.  
Thanks, Liz

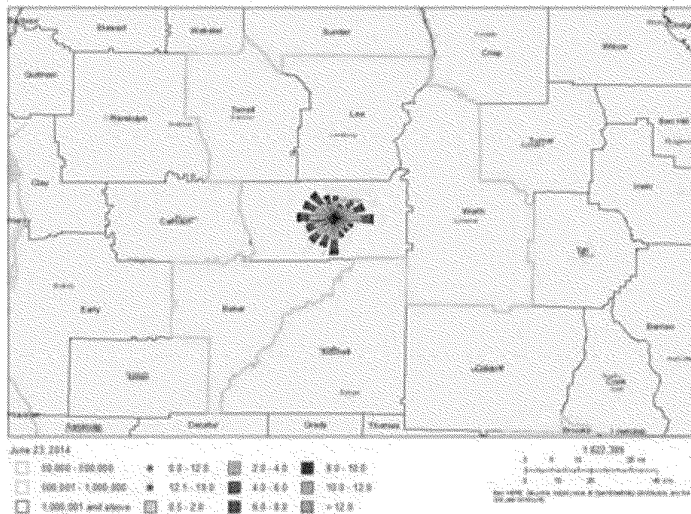


**To:** Benjamin, Lynorae[benjamin.lynorae@epa.gov]; Keating, Martha[keating.martha@epa.gov]  
**Cc:** Palma, Elizabeth[Palma.Elizabeth@epa.gov]; Gillam, Rick[Gillam.Rick@epa.gov]; Jones, Rhea[Jones.Rhea@epa.gov]; Davis, Scott[Davis.ScottR@epa.gov]  
**From:** Huey, Joel  
**Sent:** Fri 8/1/2014 4:37:22 PM  
**Subject:** RE: Please add this additional information to GA PM designations TSD

I think there are two things we can say about Lee Co., GA:

## Ex. 5 - Deliberative

## Ex. 5 - Deliberative



Okay... we understand now...

**From:** Keating, Martha  
**Sent:** Friday, August 01, 2014 12:00 PM  
**To:** Huey, Joel; Benjamin, Lynorae  
**Cc:** Palma, Elizabeth; Gillam, Rick; Jones, Rhea; Davis, Scott  
**Subject:** RE: Please add this additional information to GA PM designations TSD

Our slide 7 is highlighting Lee County, GEORGIA as part of the Albany CBSA ...

You are talking about Lee County, ALABAMA. On slide 4 we do list Lee Cty AL (Phenix City) as part of deferral area for Columbus and list the rest of Lee Cty as an adjacent U/A area. It is not in bold here because as you point out it is not a central county in the CBSA for Columbus. (It is in red because it was a change I wanted to highlight for Scott from his previous draft.)

You will still need to explain why Lee County GEORGIA is not Unclassifiable along with the Albany area.

Sorry for the confusion!

mk

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**From:** Huey, Joel  
**Sent:** Friday, August 1, 2014 11:47 AM  
**To:** Keating, Martha; Benjamin, Lynorae  
**Cc:** Palma, Elizabeth; Gillam, Rick; Jones, Rhea; Davis, Scott  
**Subject:** RE: Please add this additional information to GA PM designations TSD

Hi Martha,

We're also looking at the February 2013 CBSA list from Census. It shows:

Russell, Chattahoochee, Harris, Marion, Muscogee Counties in the "Columbus, GA-AL" CBSA

Lee County in the "Auburn-Opelika AL" CBSA

Valley County in the "Valley, AL" CBSA

All of these are in the "Columbus-Auburn-Opelika, GA-AL" CSA.

Please see attached sorted by CSA and highlighted for Columbus.

Thanks.

Joel

**From:** Keating, Martha

**Sent:** Friday, August 01, 2014 11:20 AM

**To:** Benjamin, Lynorae

**Cc:** Huey, Joel; Palma, Elizabeth; Gillam, Rick; Jones, Rhea; Davis, Scott

**Subject:** RE: Please add this additional information to GA PM designations TSD

Hi again -

I am looking at the February 2013 CBSA list from Census which lists Lee as a central county in the CBSA. Is there a more recent list?

Thanks

mk

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**From:** Benjamin, Lynorae  
**Sent:** Friday, August 1, 2014 10:48 AM  
**To:** Keating, Martha  
**Cc:** Huey, Joel; Palma, Elizabeth; Gillam, Rick; Jones, Rhea; Davis, Scott  
**Subject:** RE: Please add this additional information to GA PM designations TSD

Hi Martha,

Thanks. One point of clarification is that Lee is not in the CBSA. We thought that originally but when we looked again it was revealed that its not. The rationale on the fires is what we would use since that is clearer now.

I hope your day is going well.

Lynorae

**From:** Keating, Martha  
**Sent:** Friday, August 01, 2014 10:40 AM  
**To:** Benjamin, Lynorae  
**Cc:** Huey, Joel; Palma, Elizabeth; Gillam, Rick; Jones, Rhea; Davis, Scott  
**Subject:** RE: Please add this additional information to GA PM designations TSD

Re: Lee - Lee is highlighted because it is a central county in the CBSA. So, the optics are it should be included, unless there is rationale not to include it. Explaining that it need not be included because of fire emissions is what is needed.

After I have your draft slides to incorporate we could talk to fine tune, but it may be Monday - I am the only one in today and have a couple of fire drills ...!

Thanks

mk

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**From:** Benjamin, Lynorae  
**Sent:** Friday, August 1, 2014 10:30 AM  
**To:** Keating, Martha  
**Cc:** Huey, Joel; Palma, Elizabeth; Gillam, Rick; Jones, Rhea; Davis, Scott  
**Subject:** RE: Please add this additional information to GA PM designations TSD

Okay... we will give you a call. Where are you all on Lee? Lee emissions were primarily due to fires...

**From:** Keating, Martha  
**Sent:** Friday, August 01, 2014 10:29 AM  
**To:** Benjamin, Lynorae  
**Cc:** Huey, Joel; Palma, Elizabeth; Gillam, Rick; Jones, Rhea; Davis, Scott  
**Subject:** RE: Please add this additional information to GA PM designations TSD

Hi Lynorae -

Yes, I think: 

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Ex. 5 - Deliberative		
Ex. 5 - Deliberative	But, again, there will be discussion about <table border="1" data-bbox="1182 1598 1320 1629"><tr><td>Ex. 5 - Deliberative</td></tr></table>	Ex. 5 - Deliberative
Ex. 5 - Deliberative		
Ex. 5 - Deliberative		
Ex. 5 - Deliberative	These should be addressed in your slides.	

Thanks

Martha

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**From:** Benjamin, Lynorae  
**Sent:** Friday, August 1, 2014 10:14 AM  
**To:** Keating, Martha  
**Cc:** Huey, Joel; Palma, Elizabeth; Gillam, Rick; Jones, Rhea; Davis, Scott  
**Subject:** RE: Please add this additional information to GA PM designations TSD

Thanks Martha.

<b>Ex. 5 - Deliberative</b>	
<b>Ex. 5 - Deliberative</b>	We will have the memo to the file that describes the data issues and explains why we think the 2014 data will allow us to act. Our thoughts is that
<b>Ex. 5 - Deliberative</b>	<b>Ex. 5 - Deliberative</b>
<b>Ex. 5 - Deliberative</b>	Will that work?

I hope your day is going well.

Lynorae

**From:** Keating, Martha  
**Sent:** Friday, August 01, 2014 8:58 AM  
**To:** Benjamin, Lynorae  
**Cc:** Huey, Joel; Palma, Elizabeth; Gillam, Rick; Jones, Rhea  
**Subject:** RE: Please add this additional information to GA PM designations TSD

Hi Lynorae -

Thanks for that reminder re: deferral TSDs. All that will be needed for the deferred areas is a docket to the memo that describes the data issues and explains why we think the 2014 data year will allow us to act.

Ex. 5 - Deliberative

## Ex. 5 - Deliberative

Re: the Atlanta area (in your other email) Scott and Rhea are out today and I will be out Monday - Beth will be back though. So they will be seeing the info for the first time on Monday. Janet briefing is Wednesday!

Have a good weekend!

Martha

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**From:** Benjamin, Lynorae

**Sent:** Thursday, July 31, 2014 5:55 PM

**To:** Keating, Martha

**Cc:** Jones, Rhea; Mathias, Scott; Frank, Neil; Evangelista, Mark; Naess, Liz; Davis, Scott; Triplett, Eric; Huey, Joel; Gillam, Rick

**Subject:** RE: Please add this additional information to GA PM designations TSD

Hi Martha,

Thanks we appreciate your help with this and will make sure this is reflected in the appropriate TSDs.

Ex. 5 - Deliberative

Ex. 5 - Deliberative

If we need TSDs for the deferred areas, we have a couple more areas (i.e., Columbus and Valdosta) where we would need to include this language.

I hope your day is going well.

Lynorae

**From:** Keating, Martha  
**Sent:** Thursday, July 31, 2014 4:17 PM  
**To:** Benjamin, Lynorae; Huey, Joel; Gillam, Rick  
**Cc:** Jones, Rhea; Mathias, Scott; Frank, Neil; Evangelista, Mark; Naess, Liz  
**Subject:** Please add this additional information to GA PM designations TSD

Hello R4 folk!

After the briefing on Tuesday, we had some additional discussion here about emissions from fires and how to address those in the TSD. This topic came up specifically in the Valdosta discussion, but may be applicable to other uncl/deferred GA areas as well. Neil has developed the following narrative to explain the impact of these emissions on monitored air quality specifically with respect to the question of which counties contribute.

We think this info should be included in the Factor 1 analysis and discussion to explain why certain counties are not likely contributors. Feel free to customize with specifics such as naming specific areas that show amounts of direct PM2.5 emissions.

In general, the carbonaceous fractions of direct emissions of PM2.5 (i.e. particulate organic carbon and particulate elemental carbon) are an important “local” contributor to ambient PM2.5 concentrations. In the southern parts of GA and some nearby areas of southeast AL and northern FL, several counties show large amounts of direct PM2.5 emissions. A large portion of these emissions are associated with prescribed and managed fires which can be an annual activity. Although these emission totals are higher than direct PM2.5 emissions in other parts of the country, emissions associated with such fires are different than emissions from stationary and mobile sources. In general, these fires are only allowed to occur during conditions and times of the year that minimize their air quality impact and therefore these emissions effectively have lower ambient PM2.5 potential than their total tons imply.

In addition, the potential for violations of an air quality standard also depends on the regional and area-wide background of PM2.5 on top of which the local emission contributions are added.

In Southern GA and adjacent areas, the “regional” contributions of PM2.5 and corresponding SO2/NOx emission sources are lower than other areas of the Eastern US whose monitoring data currently show violations of the 2012 PM2.5 NAAQS. This further explains why the relatively large number of total tons of directly emitted PM2.5 in these counties by itself is not a sufficient reason to consider those counties as a likely contributor to a violation of the annual PM2.5



NAAQS.

Thanks

Martha

Martha H. Keating

Geographic Strategies Group

Air Quality Policy Division

Office of Air Quality Planning and Standards (C539-04)

U.S. Environmental Protection Agency

Research Triangle Park, NC 27711

(919) 541-9407